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January 18, 2024

BY ECF

Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Robert Birch, 23 CR 563 (LAK) (SDNY)

Dear Judge Kaplan:

I am writing on behalf of defendant Robert Birch to respectfully request a modification of the defendant's bail conditions which would permit him to travel to the District of New Jersey on Saturday, January 27, 2024 to attend the funeral services for his maternal grandfather in Fort Lee and a luncheon with his family that follows. The government, by AUSA Jamie Bagliebter, and Pretrial Services, by Jonathan Lettieri, have no objection to this request. If approved by the Court, Mr. Birch would be in the District of New Jersey from approximately 7:30 a.m. until 5:00 p.m. that day, and he would provide any additional travel details to Pretrial Services if required.

By way of background, on November 2, 2023, Mr. Birch was released on a \$500,000 personal recognizance bond signed by two financial responsible persons by Judge Gary Stein with conditions, *inter alia*, that Mr. Birch's travel be restricted to the Southern and Eastern Districts of New York. Since that time, Mr. Birch has remained compliant with the conditions of his release.

JEFFREY LICHTMAN

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Thank you for the Court's consideration of this application. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'J. Lichtman', written over a horizontal line.

Jeffrey Lichtman

cc: Jamie Bagliebter, Esq.
Elizabeth Espinosa, Esq.
Assistant United States Attorneys (by ECF)

Jonathan Lettieri
Pretrial Services Officers (by email)

So Ordered:

Hon. Lewis A. Kaplan, U.S.D.J.